EFFICACY STUDY REVIEW

by Kevin J. Sweeney, Entomologist - IB

To: Tracy Keigwin

Date: June 7, 1999

EPA Reg. No. 432-811, 867, 837, 836, and 868

Product Names: Intercept Lawn & Garden Insect Control Granules, Delta GC Insecticide Granule, DeltaGard GC Insecticide Granule, DeltaGard G Insecticide Granule, Delta Insecticide Granules,

Saga WP 432-755 was tested against scorpions.

Registrant: AgrEvo Environmental Health

PM: George LaRocca

Action: 305

Submission No. S560816, S560832, S560824, S560822, S560834

DP #: D255397, D255413, D255411, D255408, D255414

Chemical: .1% deltamethrin for all of the above except the Saga WP .06% deltamethrin

Type: (I) Insecticide granules and WP formulations

Three Studies Submitted

MRID 447835-01: Insecticidal Efficacy Against Cat Fleas of Granular Formulations of Pyrethroid Insecticide Applied to Turfgrass by D.A. Rierson and M.K. Rust, University of California at Riverside. This is a non-GLP study.

This study tested eight 0.1% deltamethrin formulations that were identified by experimental code numbers only. These numbers do not correspond with the registered products except that they are all 0.1% deltamethrin formulations. Thee registrant must identify which of the tested compounds are the products above.

Study results indicate that the products do not control fleas when applied to turf. Mortality at 24 hrs. ranged from 3.8 % to 38 % when compared to negative (untreated) controls. This level of control is too low for any label claims related to flea kill or control. Remove fleas and related

claims from all of the above product labels.

MRID 447835-02: The Evaluation of Granular and Dust Formulations of Deltamethrin for the Control of Smokeybrown Cockroaches by R. Brandenburg at North Carolina State University. This was a non-GLP study.

Smokey brown cockroaches are not listed on any of the above product labels, therefore, it is assumed that these data were submitted to support the label claim to control "cockroaches".

The compounds tested in this study were not identified as any of the above products. The only similarity between the registered products and the tested granular formulations is that they all contain 0.1 % deltamethrin. Two of the tested formulations provided 100% control, while a third provided only 25 % control of smokey brown cockroaches. For the results to be applicable to support claims for currently registered products, the registrant must identify the tested compounds. In addition, the test results are applicable to label claims for smokey brown roaches only. A broader claim to control "cockroaches" should include additional testing against another cockroach such as the Australian cockroach, *Periplaneta australasiae*, a common outdoor cockroach in southern states.

MRID 447835-03 Evaluation of the Efficacy of Saga WP, Suspend SC, InterCept H&G, DeltaDust and Delta G against the Striped Tail Scorpion, *Vejovis spinigerus* by Jing Zhai at Sierra Research Laboratories, Modesto, CA. This is a non-GLP study.

The testing protocol is incomplete. The application rate is stated but the amount applied per square centimeter is not. Negative control data were not assessed and recorded. Furthermore, it is unclear how the scorpions were exposed to the granular insecticides and what technology was used to spray the scorpions with the liquid formulations. The registrant must resubmit this study or remove scorpions from the above labels.